

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

v.

ZTE CORPORATION; ZTE (USA), INC.;
AND ZTE (TX), INC.,
Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 6:20-CV-00493-ADA

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO EXTEND RESPONSE
BRIEF DEADLINES TO MOTIONS TO DISMISS**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) files this unopposed motion to extend the deadline to file a response to Motions to Dismiss⁷ filed by defendants ZTE Corporation; ZTE (USA), Inc.; and ZTE (TX), Inc. (“Defendants”), and would show as follows:

1. On October 9, 2020, Defendants filed Motions to Dismiss, respectively, at Dkt. Nos. 22, 23, 24 (corrected by Dkt. 25).
2. Pursuant to the Local Rules, WSOU’s deadline to file responses to the Motions is October 24, 2020. WSOU requests a three-week extension of its deadlines to November 6, 2020.
3. This is the first extension WSOU has requested. The requested extension should cause no delay in the schedule.
4. WSOU has consulted with counsel for Defendants, and Defendants have indicated that they do not oppose this extension request.

⁷ The motions were additionally styled with an alternative relief to transfer. For simplification, the motions will be styled herein as Motions to Dismiss.

WHEREFORE, WSOU respectfully requests that the deadline to file a respond to Defendant's Motions, Dkt. Nos. 22, 23, 24 (corrected by Dkt. 25) be extended to November 6, 2020.

Dated: October 13, 2020

Respectfully submitted,

By: /s/ Ryan S. Loveless

James L. Etheridge

Texas Bar No. 24059147

Ryan S. Loveless

Texas Bar No. 24036997

Brett A. Mangrum

Texas Bar No. 24065671

Travis L. Richins

Texas Bar No. 24061296

Jeff Huang

Etheridge Law Group, PLLC

2600 E. Southlake Blvd., Suite 120 / 324

Southlake, TX 76092

Tel.: (817) 470-7249

Fax: (817) 887-5950

Jim@EtheridgeLaw.com

Ryan@EtheridgeLaw.com

Brett@EtheridgeLaw.com

Travis@EtheridgeLaw.com

Jeff@EtheridgeLaw.com

ATTORNEYS FOR WSOU

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this October 13, 2020, with a copy of this document via email.

/s/ Ryan S. Loveless

Ryan S. Loveless